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12 Addresses of Additional Counsel for
Plaintiffs)

13 **UNITED STATES DISTRICT COURT**
14 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

15 NATIONAL CREDIT UNION
16 ADMINISTRATION BOARD, as
Liquidating Agent of U.S. Central
17 Federal Credit Union and of Western
Corporate Federal Credit Union,

18 Plaintiff,

19 vs.

20 GOLDMAN, SACHS & CO.;
21 FREMONT MORTGAGE
SECURITIES CORP.; GS
22 MORTGAGE SECURITIES CORP.;
and RESIDENTIAL ACCREDIT
23 LOANS, INC.,

24 Defendants.

CASE NO. LA-CV-11-6521 GW (JEMx)

**APPLICATION TO FILE UNDER
SEAL PLAINTIFF'S REPLY IN
SUPPORT OF THE SETTLING
PARTIES' JOINT MOTION FOR A
BAR ORDER**

[Proposed Order Filed Concurrently]

Ctrm: Hon. George Wu

1 Pursuant to Local Rule 79-5.1 and the Protective Order entered by the Court
2 in this action (Document No. 184), Plaintiff National Credit Union Administration
3 Board (“NCUA” or “Plaintiff”) submits this application to file under seal its Reply
4 Memorandum of Law in Support of the Settling Parties’ Joint Motion for a Bar
5 Order (“Reply Memorandum”), and to file a redacted version of the Reply
6 Memorandum on the public docket.

7 The proposed redacted portions of the Reply Memorandum disclose
8 information concerning NCUA’s internal accounting allocations of past recoveries
9 in settlements with issuers and underwriters of residential mortgage-backed
10 securities (“RMBS”) who are not parties to this action. NCUA produced that
11 information to Defendants in response to past discovery requests, but designated the
12 information as “Highly Confidential” under the Protective Order. Defendants
13 Goldman, Sachs & Co. and GS Mortgage Securities Corp. (“Goldman”) previously
14 submitted NCUA’s confidential discovery responses as a sealed exhibit to their
15 November 13, 2015 filing (Document No. 496-1), and the proposed redacted
16 portions of the Reply Memorandum address Goldman’s discussion of that sealed
17 exhibit.

18 The disclosure of this information would harm or potentially harm the parties
19 and expose to the public the contents of confidential settlement negotiations and
20 internal accounting records.

21 Accordingly, Plaintiff requests that the Court grant this application and order
22 that the Reply Memorandum be filed under seal, and the redacted version be filed on
23 the public docket.

1 Dated: November 20, 2015

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